

Exhibit J

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ARTHUR J. GALLAGHER & CO.,)	
)	Case No.: 1:22-cv-03931
Plaintiff,)	
)	
v.)	DEMAND FOR JURY TRIAL
)	
ALLIANT INSURANCE SERVICES, INC.)	
)	
Defendant.)	
)	

DECLARATION OF KEVIN LEUNG

I, Kevin Leung, declare as follows:

1. I am over the age of 18 and if called as a witness could competently testify to the facts set forth herein.
2. I am a Senior Director for FTI Consulting. I have served in that role since approximately 2007. In total, I have approximately 15 years of experience in the information technology industry and 15 years of experience as a forensic investigator.
3. FTI Consulting has been retained by Plaintiff Arthur J. Gallagher & Co. in connection with the lawsuit captioned *Arthur J. Gallagher & Co. v. Alliant Insurance Services, Inc.*, Case No. 1:22-cv-03931 (N.D. Ill.).
4. In connection with that retention, I have reviewed Personal Storage Table ("PST") files of Kristen Long's Gallagher email account. The PST files that I reviewed contain metadata allowing me to identify emails that have been deleted from Ms. Long's email account as well as when they were deleted. I am able to analyze these emails because even though they were deleted from Ms. Long's inbox, they remained on Gallagher's email server

and were retained by Microsoft's retention settings.

5. The metadata that I have reviewed shows that over 7,000 emails were deleted from Ms. Long's email account, in the span of four hours, between 9:09 PM EST on July 10, 2022 and 1:18 AM EST on July 11, 2022.


6. The emails deleted from Ms. Long's email account on July 10, 2022 and July 11, 2022 included the following:

- a. The April 6, 2022 email referenced in paragraph 113 of the Complaint;
- b. The May 18, 2022 email referenced in paragraph 114 of the Complaint;
- c. The May 31, 2022 email referenced in paragraph 106 of the Complaint.

7. Along with the PST files, I was also provided an audit log from Gallagher's Information Technology Department, which I reviewed and which corroborated the actions of the aforementioned deletions.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 5, 2022



Kevin Leung